

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

: CRIMINAL NO. *1:CR-10-190*

v.

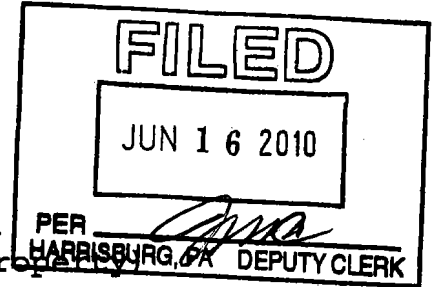
: *Chief* (Judge *Stone*)

JOHN H. HUGHES, JR. AND  
ANGEL RODRIGUEZ

INDICTMENT

Count 1

(Conspiracy to Commit Arson and  
Interstate Transportation of Stolen Property)



THE UNITED STATES OF AMERICA CHARGES THAT:

Beginning in approximately 2006, and continuing through on or about August 3, 2008, in West Manchester Township, York County, Pennsylvania, within the Middle District of Pennsylvania and elsewhere, the defendants, JOHN H. HUGHES, JR. AND ANGEL RODRIGUEZ, knowingly and willfully conspired and agreed together and with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States; to wit, arson of a property used in interstate commerce, a violation of Title 18, United States Code, Section 844(i), and interstate transportation of stolen property, a violation of Title 18, United States Code, Section 2314. The objects of this conspiracy included profiting from the sale of property and inventory stolen from the Americana Tire and Wheel Company by the defendants, JOHN H. HUGHES, JR. AND ANGEL RODRIGUEZ, and others, and concealing the thefts of said property and inventory by setting fire to the contents of the building housing Americana Tire and Wheel Company at 3001 West

Market Street, West Manchester Township, York County, Pennsylvania.

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Middle District of Pennsylvania and elsewhere:

(1) The defendants, **JOHN H. HUGHES, JR. AND ANGEL RODRIGUEZ**, and others known and unknown to the Grand Jury stole property and inventory from Americana Tire and Wheel Company and sold it to other businesses and individuals; and

(2) The defendant, **JOHN H. HUGHES, JR.** directed the defendant, **ANGEL RODRIGUEZ**, to set fire to the contents of the building housing Americana Tire Company, 3001 West Market Street, West Manchester Township, York County, Pennsylvania.

All in violation of Title 18, United States Code, Section 371.

COUNT 2  
(Arson)

**THE GRAND JURY FURTHER CHARGES THAT:**

Beginning in approximately 2006, and continuing through on or about August 3, 2008, in West Manchester Township, York County, Pennsylvania, within the Middle District of Pennsylvania and elsewhere, the defendants, JOHN H. HUGHES, JR. AND ANGEL RODRIGUEZ, aided and abetted by each other and by individuals known and unknown to the Grand Jury, maliciously damaged and destroyed and attempted to damage and destroy by means of fire a building at 3001 West Market Street, West Manchester Township, York County, Pennsylvania, housing the Americana Tire Company, GMUND Paper North America and Strategic Edge Logistics, and personal property within this building, which personal property was used in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 844(i) and Section 2.

COUNT 3  
(Interstate Transportation of Stolen Property)

Beginning in approximately 2006, and continuing through on or about August 3, 2008, in West Manchester Township, York County, Pennsylvania, within the Middle District of Pennsylvania and elsewhere, the defendants, JOHN H. HUGHES, JR. AND ANGEL RODRIGUEZ, aided and abetted by each other and by individuals known and unknown to the Grand Jury, did unlawfully transport, transmit and transfer in interstate commerce to and from West Manchester Township, York County, Pennsylvania, within the Middle District of Pennsylvania and elsewhere, stolen goods and merchandise; that is, inventory and property, including tires and rims, belonging to Americana Tire and Wheel, 3001 West Market Street, West Manchester Township, York County, Pennsylvania, of a value of \$5,000 or more, knowing the same to have been stolen.

All in violation of Title 18, United States Code, Section 2314 and Section 2.

A True Bill

*Dennis C. Pfannenschmidt*  
DENNIS C. PFANNENSCHMIDT *ug c 227*  
United States Attorney

Dated: 6/16/10